

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Jane Street Group, LLC,

Plaintiff,

-against-

Millennium Management LLC, et al.,

Defendants.

Case No.: 24 Civ. 2783

**DECLARATION OF DEBORAH K. BROWN  
IN SUPPORT OF JANE STREET'S LETTER MOTION FOR PROTECTIVE ORDER**

II, Deborah K. Brown, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”), and counsel for Plaintiff Jane Street Group, LLC (“Jane Street”). I am a member in good standing of the Bar of the State of New York and admitted to practice in the Southern District of New York. I make this declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

2. Attached hereto as **Exhibit A** is a true and correct copy of a reference chart summarizing Defendants’ requests for 30(b)(6) deposition topics, Defendants’ prior requests for production related to the same issues, the Court’s statements during the July 19, 2024 (Dkt. 180-1), and the Court’s order on Defendants’ motion to compel (Dkt. 162).

3. Attached hereto as **Exhibit B** is true and correct copy of Defendants’ Supplemental Notice of Deposition of Corporate Representative of Jane Street Group, LLC.

4. Attached hereto as **Exhibit C** is a true and correct copy of Defendants’ First Set of Requests for the Production of Documents to Jane Street.

5. Attached hereto as **Exhibit D** is a true and correct copy of an email from Alexandra Sadinsky, counsel for Douglas Schadewald and Daniel Spottiswood, and counsel for Jane Street, dated November 12, 2024.

I declare under penalty of perjury under the laws of the State of New York that the foregoing is true and correct to the best of my knowledge.

Executed on this 12th day of November, 2024, at New York, New York.

*/s/ Deborah K. Brown*

Deborah K. Brown